

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FILED  
CLERK OF COURT

DEC 13 2005 2:54

U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
TOWN OF IPSWICH,  
  
Plaintiff,  
  
v.  
  
NATIONAL UNION FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA  
  
Defendant.  
\_\_\_\_\_

CIVIL ACTION  
NO. 05-11114-MLW

**JOINT MOTION TO EXTEND TWO DEADLINES  
IN CASE SCHEDULING ORDER**

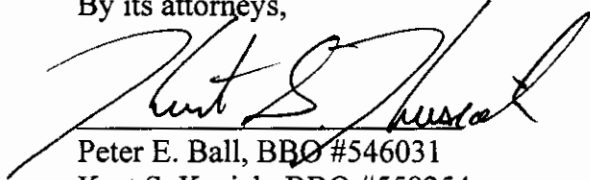
Plaintiff Town of Ipswich ("Ipswich") and Defendant National Union Fire Insurance Company of Pittsburgh, PA ("National Union") hereby jointly move this Court to extend two of the deadlines set forth in the scheduling order for this case as follows:

1) extend the deadline for filing initial disclosures under Fed. R. Civ. P. 26(a)(1)(E) from December 16, 2005 to February 24, 2006; and 2) extend the deadline to serve written discovery requests from January 3, 2006 to March 17, 2006.

As grounds for this motion, Ipswich and National Union state that they are very close to settling this matter, after having attended mediation sessions occurring on November 4, 2005 and December 6, 2005. Ipswich requires Town committee approvals before any settlement can be approved, and those meetings cannot happen until early January.

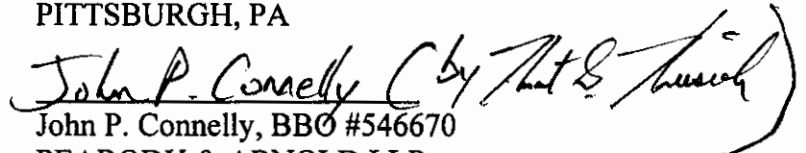
The parties believe that it is in the best interests of both of the parties and this Court to have the mediation/ settlement process conclude before the parties incur time and expense with further pleadings such as initial disclosures and written discovery.

PLAINTIFF TOWN OF IPSWICH  
By its attorneys,



Peter E. Ball, BBO #546031  
Kurt S. Kusiak, BBO #559254  
SALLY & FITCH LLP  
225 Franklin Street  
Boston, MA 02110  
(617) 542-5542

DEFENDANT NATIONAL UNION  
FIRE INSURANCE COMPANY OF  
PITTSBURGH, PA



John P. Connelly, BBO #546670  
PEABODY & ARNOLD LLP  
30 Rowes Wharf  
Boston, MA 02110  
(617) 951-2100

Dated: December 12, 2005